

# UNITED STATES DISTRICT COURT

for the  
Central District of California

In the Matter of the Search of )  
One United States Postal Service Parcel in the )  
custody of the United States Postal Inspection ) Case No. **2:23-MJ-03120**  
Service, in Los Angeles, California )  
)  
)

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

*See Attachment A*

located in the Central District of California, there is now concealed (*identify the person or describe the property to be seized*):  
*See Attachment B*

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)(1)	(Distribution and Possession with Intent to Distribute a Controlled Substance)
21 U.S.C. § 846	(Conspiracy to Distribute or Possess with Intent to Distribute a Controlled Substance)
21 U.S.C. § 843(b)	(Unlawful Use of a Communication Facility, including the Mails, to Facilitate the Distribution of a Controlled Substance)

The application is based on these facts: *See attached Affidavit*

☒ Continued on the attached sheet.

☐ Delayed notice of \_\_\_\_\_ days (*give exact ending date if more than 30 days*: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/s/ USPI Rex Castro, United States Postal Inspection Service

*Applicant's signature*

USPI Rex Castro, United States Postal Inspection Service

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: \_\_\_\_\_

*Judge's signature*

City and state: Los Angeles, CA

The Honorable Brianna Mircheff, U.S. Magistrate Judge

*Printed name and title*

AUSA: Derek R. Flores (x4896)

**ATTACHMENT A**

PARCEL TO BE SEARCHED

The following USPS parcel (the "**SUBJECT PARCEL**"), currently in the custody of the United States Postal Inspection Service: **SUBJECT PARCEL** is a USPS Retail Ground parcel bearing tracking number 9534 6131 8229 3136 9895 89. The **SUBJECT PARCEL** has a handwritten label, with return address "11230 Reliance Dr. Riverside CA 92505," listed sender "Betty Irving," recipient address "604 E 3rd Ave Fairbank Alaska 99701," and listed recipient "DiAnE Irving."

**ATTACHMENT B**

ITEMS TO BE SEIZED

The following are the items to be seized from **SUBJECT PARCEL** described in Attachment A, which constitute the fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Distribution and Possession with Intent to Distribute a Controlled Substance); 846 (Conspiracy to Distribute or Possess with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance):

- a. Any drugs, including cannabis;
- b. Currency, money orders, bank checks, or similar monetary instruments in aggregate quantities over \$1,000; and
- c. Packaging material.

**AFFIDAVIT**

I, Rex Castro, being duly sworn, declare and state as follows:

**I. INTRODUCTION**

1. I am a United States Postal Inspector ("USPI") with the United States Postal Inspection Service ("USPIS") and have been since August 2019. I have completed a fourteen-week basic training course in Potomac, Maryland, which included training in the investigation of drug trafficking via the United States Mail. I am currently assigned to the USPIS Los Angeles Division, Contraband Interdiction and Investigations team, which is responsible for investigating narcotics trafficked through the United States Mail.

2. Since August 2019, I have participated in multiple investigations into violations of the Controlled Substances Act involving the U.S. Mail and discussed my investigations with other experienced law enforcement officers. During my employment, I have written affidavits in support of complaints and search warrants, and executed numerous federal arrests, both as part of my own investigations and assisting in other investigations. For these reasons, I am familiar with how drug traffickers use the mail to facilitate their trafficking.

3. Through training, experience, and discussion with fellow Postal Inspectors, I am also familiar with various methods of smuggling and trafficking drugs and drug proceeds.

**II. PURPOSE OF AFFIDAVIT**

4. I make this affidavit in support of an application for a search warrant for the following parcel (the "**SUBJECT**

**PARCEL**"), which was shipped through the United States Postal Service ("USPS") and is currently in the custody of USPIS in Los Angeles, California: a USPS Retail Ground parcel bearing tracking number 9534 6131 8229 3136 9895 89. The **SUBJECT PARCEL** has a handwritten label, with return address "11230 Reliance Dr. Riverside CA 92505," listed sender "Betty Irving," recipient address "604 E 3rd Ave Fairbanks Alaska 99701," and listed recipient "DiAnE Irving." The **SUBJECT PARCEL** is described more fully in Attachment A, which is incorporated by reference.

5. The requested search warrant seeks authorization to seize evidence, fruits, and instrumentalities of violations of 21 U.S.C. §§ 841(a)(1) (Distribution and Possession with Intent to Distribute a Controlled Substance), 846 (Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance), and 843(b) (Unlawful Use of a Communication Facility, including the Mails, to Facilitate the Distribution of a Controlled Substance) (the "**SUBJECT OFFENSES**"), as described more fully in Attachment B, which is also incorporated by reference.

6. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are

related in substance and in part only, and all dates and times are on or about those indicated.

### **III. SUMMARY OF PROBABLE CAUSE**

7. USPIS Alaska is investigating a Drug Trafficking Organization ("DTO") that ships parcels containing suspected drugs through the U.S. Mail from California to Alaska.

8. As part of this investigation, USPIS Alaska seized a parcel in Fairbanks, Alaska containing approximately 7,000 suspected fentanyl pills that was addressed to "604 E 3rd Ave Fairbanks Alaska 99701." Alaska USPI Alex Laumb told me that, based on the investigation, he learned there was a similar parcel that had been sent to Fairbanks, Alaska that was being returned to the Los Angeles area.

9. On June 12, 2023, I flagged the **SUBJECT PARCEL** based on the information provided by USPI Laumb and because it met certain criteria common to packages containing contraband, including that it was a USPS Retail Ground parcel without a business account number, had a handwritten label, the seams were taped, and had sender/recipient names that were not associated with the return/delivery addresses according to law enforcement databases. The **SUBJECT PARCEL's** recipient address was "604 E 3rd Ave Fairbank Alaska 99701."

10. Both the **SUBJECT PARCEL** and the parcel with approximately 7,000 suspected fentanyl pills seized by USPIS have similar characteristics. Both parcels entered the mail stream on the same day in the same area. Both parcels were addressed to the Fairbanks, Alaska area. Both parcels used the

same red labels for the sender and recipient information. Both parcels have similar handwriting for the sender and recipient information. Both parcels used the same red "FRAGILE - Handle with Care" stickers. Both parcels had taped seams.

#### **IV. STATEMENT OF PROBABLE CAUSE**

##### **A. Background on Use of Mails for Drug Trafficking**

11. Based on my training and experience as a USPI, and the experiences related to me by fellow Postal Inspectors, I know the following:

a. The Los Angeles area is a major source for drugs. Drugs are frequently transported from the Los Angeles area through the U.S. Mail, and the proceeds from drug sales are frequently returned to the Los Angeles area through the mail. These proceeds are generally in the form of cash, money orders, bank checks, or similar monetary instruments in an amount over \$1,000. Based on my training and experience, I know that proceeds from drug sales often contain the drug odor because they have been contaminated by or associated with the odor of one or more drugs.

b. Drug distributors often use USPS Priority Mail Express, which is the USPS overnight/next-day delivery mail product, or Priority Mail Service, which is the USPS two-to-three-day delivery mail product. Drug distributors use the Priority Mail Express delivery service because of its speed, reliability, and the ability to track the parcel's progress to delivery. Drug distributors use the Priority Mail delivery service because it provides them more time for travel between

states if they decide to follow their shipments to their destination for distribution. By adding delivery confirmation to a Priority Mail parcel, drug traffickers can track the parcel's progress to the intended delivery point, as if the parcel had been mailed using the Priority Mail 2-Day Service.

12. Based on my training and experience as a USPI, and the experiences related to me by fellow Postal Inspectors who specialize in drug investigations, I know that the following indicia suggest that a parcel may contain drugs or drug distribution proceeds:

- a. The parcel is contained in a Large Flat Rate cardboard box;
- b. The parcel bears a handwritten or typed label, whether USPS Express Mail or Priority Mail;
- c. The handwritten or typed label on the parcel does not contain a business account number;
- d. The seams of the parcel are all taped or glued shut;
- e. The parcel emits an odor of a cleaning agent or adhesive or spray foam that can be detected by a human; and
- f. Multiple parcels are mailed by the same individual, on the same day, from different locations.

13. Parcels exhibiting such indicia may be subject of further investigation, which may include verification of the addressee and return addresses and examination by a trained drug detection dog.

12. I know from my training and experience that drug traffickers often use fictitious or incomplete names and addresses to try to conceal their identities from law enforcement officers investigating these types of cases. To the extent that real addresses are ever used, it is only to lend a legitimate appearance to the parcel and is almost always paired with a false name.

14. And, based on my training and experience, I know that subjects who send or receive drugs and drug proceeds often do not write phone numbers on the parcel to try to hide their association with the parcel. They often send mail from postal facilities outside their own ZIP code to try to hide their association with the parcel. They often hand write addresses on parcels, use return addresses that do not verify with the USPS database, and do not list the sender's last name to try to hide their association with the parcel. And they often use a large amount of tape on the seams of drug packages to try to avoid detection by drug-detection dogs.

**B. Initial Investigation of the SUBJECT PARCEL**

15. On June 7, 2023, Alaska USPI Alex Laumb told me that USPIS Alaska was investigating a DTO that had used USPS Priority Mail Service to ship parcels from California to Alaska but recently may have switched to utilizing USPS Retail Ground shipping services. USPI Laumb told me that, as part of the investigation, USPIS Alaska seized a parcel in Fairbanks, Alaska containing approximately 7,000 suspected fentanyl pills. USPI Laumb also told me that, based on the investigation, he learned

there was a similar parcel that had been sent to the Fairbanks, Alaska area that was being returned to the Los Angeles area.

16. On June 12, 2023, I identified the **SUBJECT PARCEL** in the Los Angeles area based on the information provided by USPI Laumb and because it met certain criteria common to packages containing contraband, including that it was a USPS Retail Ground parcel without a business account number, had a handwritten label, was heavily taped, and had sender/recipient names that were not associated with the return/delivery addresses according to law enforcement databases.

17. Below are photographs of the **SUBJECT PARCEL**:



18. Upon further review of the **SUBJECT PARCEL** and Thomson Reuters CLEAR<sup>1</sup> database records, I determined that:

a. The **SUBJECT PARCEL** was mailed using USPS Retail Ground and has tracking number 9534 6131 8229 3136 9895 89. The **SUBJECT PARCEL** has a handwritten label and does not contain a business account number. According to CLEAR database records, the **SUBJECT PARCEL**'s listed return address ("11230 Reliance Dr. Riverside CA 92505") appears to be valid but does not appear to be associated with the listed sender ("Betty Irving"). And the listed recipient address ("604 E 3<sup>rd</sup> Ave Fairbank Alaska 99701") appears to be valid but does not appear to be associated with the listed recipient ("DiAnE Irving").

19. On June 14, 2023, USPI Laumb provided me pictures of the parcel seized by USPIS Alaska containing approximately 7,000 suspected fentanyl pills. Below is a photograph of the parcel:



<sup>1</sup> CLEAR is a public information database used by law enforcement that provides names, addresses, telephone numbers, and other identifying information.

20. Based upon my review of the **SUBJECT PARCEL**, photographs of the parcel seized by USPIS Alaska containing approximately 7,000 suspected fentanyl pills, and USPS records, I determined the following:

a. Both parcels entered the mail stream on the same day (May 16, 2023) in the same area (Riverside, California).

b. Both parcels are addressed to the Fairbanks, Alaska area.<sup>2</sup>

c. Both parcels used the same red labels for the sender and recipient information.

d. Both parcels have similar handwriting for the sender and recipient information.

e. Both parcels used the same red "FRAGILE - Handle with Care" stickers.

f. Both parcels had taped seams.

**C. No Drug-Detection Dog Used Due to Suspected Fentanyl**

21. Because the **SUBJECT PARCEL** may contain fentanyl, I asked Los Angeles Police Department Officer and K-9 handler Brett Coffey about drug-detection dog examinations. Officer Coffey told me that no LAPD drug-detection dogs are imprinted on fentanyl and that he is not aware of any drug-detection dog in or around Los Angeles trained to detect fentanyl. Officer Coffey stated that, if there is a parcel is suspected of containing fentanyl, LAPD will not permit a drug-detection dog to examine the parcel.

---

<sup>2</sup> The parcel seized by USPIS Alaska contains the typo "Fairbank."

**V. CONCLUSION**

22. For the reasons above, there is probable cause to believe that the items listed in Attachment B, which constitute evidence, fruits, and instrumentalities of the **SUBJECT OFFENSES**, will be found in the **SUBJECT PARCEL**, as described in Attachment A.

Attested to by the applicant in  
accordance with the requirements  
of Fed. R. Crim. P. 4.1 by  
telephone on this \_\_\_\_ day of  
June, 2023.

---

THE HONORABLE BRIANNA F. MIRCHEFF  
UNITED STATES MAGISTRATE JUDGE